

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT)
CORPORATION and LAW DEBENTURE)
TRUST COMPANY OF NEW YORK,)
Plaintiffs,)
v.) C.A. No. 04-1494-(JJF)
NORTHWESTERN CORPORATION,)
Defendant.)

MAGTEN ASSET MANAGEMENT CORP.,)
Plaintiff,)
v.) C.A. Action No. 05-499 (JJF)
MICHAEL J. HANSON and ERNIE J. KINDT,)
Defendants.)

TO: Victoria Watson Counihan, Esquire
Greenberg Traurig LLP
The Nemours Building
1007 North Orange Street, Ste. 1200
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Joseph D. Pizzurro, Esquire
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101 Park Avenue
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NOTICE OF DEPOSITION OF BART THIELBAR

PLEASE TAKE NOTICE that Plaintiff Magten Asset Management Corp. will take the deposition of Bart Thielbar commencing at 9:30 a.m. on May 1, 2007 and continuing until completed, at the offices of Blank Rome LLP, 1201 N. Market Street, Suite 800, Wilmington, DE 19801. The deposition will be taken before a notary public or other officer authorized by law to administer oaths, and may be recorded by stenographic and videographic means.

Dated: April 24, 2007

BLANK ROME LLP

Dale R. Dubé

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- and -

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2007, I served by hand delivery and electronic filing the **NOTICE OF DEPOSITION OF BART THIELBAR**, using CM/ECF which will send notification of such filing(s) to the following:

BY EMAIL AND HAND DELIVERY

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I also certify that, on this 24th day of April, 2007, I served the aforementioned document, by e-mail and Federal Express, upon the following participants:

BY EMAIL AND FEDERAL EXPRESS

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